

EXHIBIT 2

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

VICKIE SHERMAN, LEZAH NEVILLE-MARRS,
 KATHERINE LOOPERS, and JARRED JOHNSON,
 individually and on behalf of all others similarly
 situated,

Plaintiffs,

v.

FACEBOOK, INC., a Delaware corporation
 headquartered in California,

Defendant.

Case No. 3:20-cv-08721-LB

**STIPULATION AND ORDER TO
 STAY**

Hon. Laurel Beeler

1 WHEREAS, six putative class action lawsuits¹ have been filed against defendant
2 Facebook, Inc. in this District in recent weeks alleging violations of Section 2 of Sherman Act,
3 15 U.S.C. § 2;

4 WHEREAS, four of these lawsuits, including this case, are currently the subject of
5 contested motions pending before Judge Freeman to consider whether the cases should be related
6 to *Reveal Chat Holdco, LLC v. Facebook, Inc.*, No. 5:20-cv-00363-BLF;

7 WHEREAS, regardless of the outcome of Facebook's pending motion to relate the six
8 putative class action lawsuits that have been filed against Facebook to *Reveal Chat*, those six
9 cases themselves are likely to be the subject of motions to relate to one another;

10 WHEREAS, should Judge Freeman grant the pending motions to relate the cases, the
11 court will need to determine the manner in which these cases will proceed;

12 WHEREAS, regardless of whether Judge Freeman grants the pending motions to relate
13 the cases, one or more courts in this District may need to decide issues around interim class
14 counsel and/or whether to consolidate the cases;

15 WHEREAS, moving forward with responsive pleadings and other matters in this case
16 may impose an unnecessary burden on the Court and parties until the threshold issues of case
17 administration are resolved;

18 ACCORDINGLY, pursuant to Civil Local Rules 6-1 and 7-12, defendant Facebook, Inc.
19 and plaintiffs Vickie Sherman, Lezah Neville-Marrs, Katherine Loopers, and Jarred Johnson, by
20 and through their respective counsel, hereby stipulate and agree that good cause exists to stay
21 Facebook's time to answer or otherwise respond to the Complaint until further order of the
22 Court, and until such time as the Court convenes a status conference and issues any necessary
23 orders on how this case shall proceed.

24
25 ¹ In addition to this case, the lawsuits are: *Klein v. Facebook, Inc.*, No. 5:20-cv-08570-LHK;
26 *Kupcho v. Facebook, Inc.*, No. 4:20-cv-08815-JSW; *Dames v. Facebook, Inc.*, No. 3:20-cv-
27 08817-TSH; *Steinberg v. Facebook, Inc.*, No. 3:20-cv-09130-SK; and *Affilious, Inc. v. Facebook,*
28 *Inc.*, No. 4:20-cv-09217-KAW.

1
2 Dated: December 22, 2020

WILMER CUTLER PICKERING HALE
AND DORR LLP

3 By: /s/ Sonal N. Mehta

4 SONAL N. MEHTA

5
6 *Attorney for Defendant*
Facebook, Inc.

7
8 Dated: December 22, 2020

AHDOOT & WOLFSON PC

9 By: /s/ Tina Wolfson

10 Tina Wolfson

11 *Attorney for Plaintiffs*
12 Vickie Sherman, Lezah Neville-Marrs,
13 Katherine Loopers, and Jarred Johnson

SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing. Pursuant to Civil Local Rule 5-1(i), I hereby attest that the other signatories have concurred in this filing.

Dated: December 22, 2020

By: /s/ Sonal N. Mehta
Sonal N. Mehta

ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED: Facebook's time to answer or otherwise respond to the Complaint is STAYED pending further order of the Court. At the appropriate time the Court SHALL convene a status conference and issue any necessary orders on how this case shall proceed.

DATED: December 23, 2020

By: 

Hon. Laurel Beeler

United States Magistrate Judge

Submitted by:

WILMER CUTLER PICKERING HALE AND DORR LLP

By: /s/ Sonal N. Mehta

Attorney for Facebook, Inc.